

BANK OF AMERICA / DODD-FRANK ISSUES

1. Exchange/SEF Trading Requirement: Manner of execution; scope of definition.
2. Real Time Reporting: Time periods for reporting different types of transactions; method of dissemination; information to be included; publication of information; impact on liquidity.
3. Definitions of Swap, Security-Based Swap, Major Swap Participant and Major Security-Based Swap Participant: Scope of definitions; applicability to different types of entities.
4. Inter-Affiliate Trades: Applicability of execution, clearing and margin requirements to transactions between affiliates; impact on treatment as swap dealer, security-based swap dealer, major swap participant or major security-based swap participant.
5. Position Limits: Structure and extent of position limit regime.